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Federal Communications Commission
Office of the Secretary



ALLTEL SERVICE CORPORATION

1710 Rhode Island Ave. NW • Suite 1000 • Washington, DC 20036
Telephone: 202-331-0113 Facsimile: 202-331-0082

ORIGINAL
FILE

August 27, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

RE: In the Matter of Billed Party Preference for 0+ InterLATA
Calls, CC Docket No. 92-77

Dear Ms. Searcy,

Enclosed for filing by ALLTEL Service Corporation, on behalf of its affiliated local exchange telephone companies, are an original and nine copies of its reply comments in the above referenced proceeding.

Should there be any questions concerning this matter, please contact the undersigned counsel.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn Hill".

Carolyn C. Hill
Federal Regulatory Counsel

rf
Enclosures

Ms. Searcy
10/1/92
0+8

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AUG 27 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Billed Party Preference) CC Docket No. 92-77
for 0+ InterLATA Calls)

Reply Comments of
ALLTEL Service Corporation

ALLTEL Service Corporation, on behalf of its affiliated local exchange telephone companies (hereinafter "ALLTEL"), respectfully submits its reply comments in the above captioned matter. ALLTEL has the same concerns as many of the commenting parties regarding the issue of cost recovery for local exchange carriers (LECs) if billed party preference is adopted, and the issues of technical limitations, particularly among the independent LECs, relating to any implementation of billed party preference.

- I. Any rules for implementation of billed party preference should recognize technical limitations of independent telephone companies.

The ALLTEL telephone system is composed of over 600 exchanges in 25 states. In these exchanges, ALLTEL deploys a much broader array of equipment and technologies than those utilized by the Regional Bell Operating Companies ("RBOCs"). Because of this, ALLTEL has not had sufficient time to evaluate the impact of implementation of billed party preference. However, ALLTEL has determined from its preliminary analysis that for many of these

exchanges the equipment may not support the dialing sequences necessary for billed party preference. If the Commission adopts billed party preference, it should exempt exchanges where equipment does not support transfer of dialed billing information to an operator service switch until the normal course of network upgrades would effect the required changes. Sprint noted a similar concern in its comments and recommended that the Commission adopt a different service standard regarding Automated Alternate Billing Services ("AABS") implementation for independent LECs than for the RBOCs.¹

II. Local exchange carriers, including ALLTEL, have not had sufficient time to estimate the potential costs for implementation of billed party preference.

ALLTEL has experienced difficulties similar to those of Southwestern Bell, the Pacific Companies, and Bell Atlantic in adequately estimating the potential costs for implementation of billed party preference.² ALLTEL has participated in industry forums and contacted its vendors, but is still not able to estimate with certainty the potential costs for implementation of billed party preference because of the lack of information from vendors and incompleting internal studies. However, ALLTEL's preliminary analysis indicates it will have both significant hardware and software costs. These costs include those associated with expanding the Line Information Data Base ("LIDB") to include a

¹ Sprint comments at p. 25.

² See, for example, the comments of the Pacific Companies at p.2, Southwestern Bell at pp.10-12, and Bell Atlantic, Attachment A.

primary and secondary interexchange carrier for billed party preference purposes. Support of the expanded LIDB will, in turn, require customer service personnel training and significant customer education to initiate and support the expanded LIDB.

Prior to any action adopting billed party preference, the Commission should seek further comment and allow adequate time for response regarding determination of the potential costs for implementation of billed party preference. ALLTEL will support the United States Telephone Association ("USTA") in its efforts to estimate these costs on behalf independent LECs. Moreover, once these costs are quantified, the issue of proper cost recovery, discussed below, becomes a significant concern.

III. Costs associated with billed party preference should be recovered from operator service providers and not be allowed to increase existing local service or access rates.

ALLTEL agrees with those commenting parties supporting recovery of billed party preference implementation costs from operator service providers.³ ALLTEL believes that the costs associated with any implementation of billed party preference should not be allowed to increase local rates or intrastate and interstate access charges. Increases in these rates would exacerbate the threat of network bypass. Rather, those OSPs benefitting from calls forwarded to them, by whatever means, should pay the associated costs. OSPs can, in turn, recover the costs of billed party preference from customers utilizing their services.

³ See, for example, the comments of GTE, p.12,

In order that the issues related to identification and recovery of billed party implementation costs be sufficiently reviewed, ALLTEL believes that the Commission must seek further comment on the issue of cost recovery.


Conclusion:

If the Commission adopts billed party preference, ALLTEL believes that the Commission must recognize the potential technical limitations of independent LECs, such as the ALLTEL companies, and provide for an exemption mechanism until the normal course of network upgrades would effect the required changes to implement billed party preference. Additionally, the record in this proceeding does not provide sufficient information on the level of LEC costs for implementation of billed party preference and the related recovery of those costs. Before any final action is taken to implement billed party preference, ALLTEL urges the Commission to seek further comment on the issue of cost levels and cost recovery.

Respectfully submitted,

ALLTEL Service Corporation,
on behalf of the ALLTEL local
exchange telephone companies.

By



Carolyn C. Hill
ALLTEL Service Corporation
1710 Rhode Island Ave NW Suite 1000
Washington, DC 20036

Its Attorney

August 27, 1992

Certificate of Service

I, Rita Ferrando, do hereby certify that on this 27th day of August 1992, copies of the foregoing reply comments were served by hand or by U. S. Mail, postage prepaid, to the parties listed on the attached service list.


Rita Ferrando

August 27, 1992

Certificate of Service

Gary C. Phillips
FCC
1919 M ST.NW, Room
544
Washington, DC 20554

Allnet
Communications
Roy Morris
1990 M St.NW-#500
Washington, DC 20036

AT&T
Francine Berry
295 N. Maple Ave
#3244J1
Basking Ridge, NJ
07920

Reed, Smith, Shaw &
McClay
Judith St. Ledger-
Roty
1200 19th Street NW
Washington, DC 20036

Jones, Day, Reavis
Randall Lowe
1450 G Street NW
Washington, DC 20005

ITT Communications
John Ligon
100 Plaza Drive
Secaucus, NJ 07096

Schmeltzer, Aptaker
& Shepard
Gary Liebert
2600 VA Ave NW #1000
Washington, DC 20037

National Association
Truck Stop Operators
W. Dewey Clower
1199 N. Fairfax St
Alexandria VA 22314

Weisman Enterprises
William Weisman
2626 W. Lake Street
Minn, MN 55416-4405

Squire, Sanders &
Joseph Markoski
P. O. Box 407
Washington, DC 20044

NYNEX
Patrick Lee
120 Bloomingdale
Wht Plns, NY 10605

Swidler & Berlin
Andrew Lipman
3000 K Street NW
Washington, DC 20007

US Sprint
Leon Kestenbaum
1850 M St NW #1000
Washington, DC 20036

Keck, Mahin & Cate
Albert Kramer
Penthouse Suite
1201 N Y Ave NW
Washington, DC 20005

Reboul MacMurray
1119 19th NW #406
Washington, DC 20036

Tennessee PSC
Henry Walker
460 Jas Robrtson Pky
Nashville, TN 37219

Central Telephone
Carol Sulkes
8745 Higgins Road
Chicago, IL 60631

Sutherland, Asbill
Randolph J. May
1275 Penn Ave NW
Washington, DC 20004

Ameritech Services
Floyd Keene
Room 4H74
2000 W.Ameritech Dr
Hoffman, IL 60196

BellSouth
William Barfield
Suite 1800
1155 Peachtree NE
Atlanta, GA 30367

Contel
Linda Muir
P. O. Box 105194
Atlanta, GA 30346

Florida PSC
David Smith
101 E. Gaines Stt
Talla., FL 32399

MD People's Counsel
John Glenn-9th Floor
231 E. Baltimore St.
Baltimore, MD 21202

MD PSC
Bryan Moorhouse
231 E. Baltimore St
Baltimore MD 21202

MCI
John Scorce
1801 Penn Ave NW
Washington, DC 20036

NARUC
Paul Rodgers
P. O. Box 684
Washington, DC 20044

Wiley Rein Fielding
Richard Wiley
1776 K Street NW
Washington, DC 20006

Rochester Tel.
Josephine S. Trubek
180 S. Clinton Ave
Rochester, NY 14646

Southwestern Bell
Durward Dupre
1010 Pine St Rm.2114
St. Louis, MO 63101

United Telecom
Jay Keithley
1850 M St NW #1110
Washington, DC 20036

U S West
Lawrence Sargeant
1020 19th St NW #700
Washington, DC 20036

SNET
William Werwaiss
227 Church Street
New Haven, CT 06506

Pacific Bell
James Tuthill-Rm1525
140 New Montgomery
San Fran CA 94105

Taylor, Thiemann
Alan Thiemann
908 King Street
Alexandria VA 22314

Elcotel, Inc.
Karen M. DeYoung
6428 Parkland Dr
Sarasota, FL 34243

Call America
Kellie Cooke
870 Morro Street
San Luis, CA 93401

City of Mesa
Daniel Brewer
59 E. First St
P.O.Box 1466
Mesa, AZ 85211

Charter Pines
Glenn Hamilton
3621 Randolph Rd
Charlotte NC 28211

Plaza/Latham Assoc.
Sue Ellen Weister
800-19 New Loundon
P. O. Box 639
Latham, NY 12110

Youngs Food Store
Bill Mazonkey
P. O. Box 1000
Sumter, SC 29151

Easter Telephone
Darrell L. Maynard
881 N. Mayo Trail
Pkvle KY 41502-1138

Com. of Streets
Wayne Murdock
3rd Floor-City Hall
Cedar Raps IA 52401

Hillsborough Cty
Walter Heinrich
P. O. Box 3371
Tampa, FL 33601

City of Louisville
Jill Gibbons
Room 113-City Hall
Louisville, KY 40202

Hotelco
Brooks H. Haden
20 Sunnyside Av #223
Mill Vly, CA 94941

R2 Props, Inc.
Shirley Richards
8963 E. Tanque Verde
Box 116
Tucson, AZ 85749

Leonard E. Polan
31755 Bedfrdhurst Ct
Wstlake Vlg CA 91361

Phoebe Czikra
3313 Doris Place
Anchorage, AK 99517

Bruce G. Marlowe
38185 Columbine
Newark, CA 94560

Bella Lumm
999 N. Caribe
Tucson, AZ 85710

National Telephone
John F. Nort
5445 Spalding Dr
Norcross, GA 30092

Superior Electronics
David Carter
I-20 & US 401
Route 2 Box 121-1
Tmmnsvl SC 29161

South Sheriff's Assn
Jeffrey Moore
P. O. Box 21428
Columbia, SC

Ohio Rehab
Eric Dahlbert
1050 Freeway North
Columbus, OH 43229

N.C. Correction
W. Kautzky
214 W. Jones St
Raleigh, NC 27603

Florida PSC
William Wyrrough
101 E. Gaines St
Tall, FL 32399

Marta Greytok
7800 ShoalCrk 400 N
Austin TX 78759

Illinois Commerce
Darrell Townsley
180 N. LaSalle #810
Chicago, IL 60601

Indiana Utility
James Monk
302 W. Wash #E306
Ind, IN 46204

Public Utilities
James Gainer
180 E. Broad Street
Columbus, OH 43266

Missouri PSC
Colleen Dale
P. O. Box 360
Jeff City MO 65102

FL House of Reps.
Bob Starks
1312 Palmetto Ave
Winter Pk FL 32789

Reno Cannon
Inter.Airport
Robert White
Reno Stead Airport
Box 12490
Reno, NV 89510

Norfolk Airport
Authority
Kenneth R. Scott
Norfolk, VA 23518

Lubbock Int
Bern E. Case
Rte 3 Box 380
Lubbock, TX 79540

Duke University
James B. Dronsfield
Durham, NC 27706

Montana State U
Patricia A. Simmons
Bozeman, MT 59717

American Jail Assn
Richard Kiebusch
1000 Day Rd-#100
Hgrstown, MD 21740

Nison, Hargrave
Veronica Ahern
1 Thomas Circ #800
Washington, DC 20005

Memphis-Shelby
Jerry McMichael
Memphis Int
P.O.Box 30168
Memphis, TN 38130

City of Fresno
Krys T. Bart
2401 N. Ashley Way
Fresno, CA 93727

WI Corrections
Pamela J. Brandon
P. O. Box 7925
Madison, WI 53707

Dept. of Admin.
George Christenberry
Suite 1402 West Tower
200 Piedmont Ave
Atlanta, GA 30334

UT Correction Dept.
O. Lane McCotter
6100 S. 300 East
Murray, Utah 84107

Clark County
Robert Broadbent
McCarran Int
P. O. Box 11005
Las Vegas, NV 89111

SC Jail Admin
Perry R. Eichor
P. O. Box 10171
Greenville, SC 29603

National Assn of
Truck Stop Opers.
W. Dewey Clower
Suite 801
1199 N. Fairfax St
Alexandria, VA 22314

Morrison & Foerster
Debra Lagapa
Suite 5500
2000 Penn Ave NW
Washington, DC 20006

Sharenet Comms.
Gary Joseph
P. O. Box 14349
Phoenix, AZ 85063

Douglas N. Ownes
4705 16th Street NE
Seattle WA 98105

Value-Added Comms
Charles P. Miller
Suite 530
1901 S. Meyers Rd
Oakbrk Ter IL 60181

Fish & Richardson
Walter Steimel
5th Floor North
601 13th Street NW
Washington, DC 20005

Graham & James
Richard L. Goldbert
Third Floor
One Maritime Plaza
San Fran, CA 94111

ComCentral Corp.
Teltronics, Corp.
John Priest
2150 Whitefld Ind.
Sarasota, FL 34243

Alternate Comms.
H. William Orr
Suite 103
8802 N. Meridian
Ind, IN 46260

Advanced Bus Coms.
John B. Mow #105A
4801 Spring Valley
Dallas, TX 75244

Advanced Payphone
Steve Schude
Suite 122
535 W. Iron Ave
Mesa, AZ 85210

Comtel Computer
John Ligon
128 Mt. Hebron Ave
P. O. Box 880
Upr Montclr NJ 07043

Advanced Telecomm
Douglas Brent
10000 Shelbyville Rd
Louisville KY 40223

LDDS Communications
Catherine R. Sloan
1825 Eye St NW #400
Washington, DC 20006

LinkUSA
Steven Hogan
Suite 400
230 2nd Street SE
Cedr Rapids IA 52401

Bell Atlantic
John Goodman
8th Floor
1710 H Street NW
Washington DC 20006

Pacific Telesis
Celia Nogales
Suite 400
1275 Pennsylvania
Ave NW
Washington, DC 20004

GTE
Gail L. Polivy
Suite 1200
1850 M Street NW
Washington, DC 20036

FCC Contractor
1919 M Street NW
Room 246
Washington, DC 20554